

**BARCLAY DAMON** <sup>LLP</sup>

**Benjamin R. Zakarin**  
*Counsel*

June 12, 2025

**VIA ECF**

Hon. Judge Justin T. Quinn  
United States District Court  
District Court of New Jersey  
Clarkson S. Fisher Building  
402 East State Street, Room 6W  
Trenton, NJ 08608

Re: Freedom Funding Group, Inc. v. The Freedom Fundinggroup LLC  
Case No.: 3:20-cv-1804-JTQ

Dear Judge Quinn:

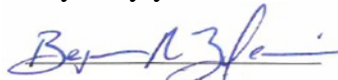
I write to respectfully update the Court on the status of this matter pursuant to the Court's June 11, 2025, text order.

My appearance on behalf of Plaintiff was undertaken for the limited purpose of assisting the entity in reviving the case following a deadline-related dismissal. At the time, I understood that Plaintiff intended to promptly retain permanent counsel.

However, I have not received any communication from Plaintiff or its principal in nearly a year and my firm's limited engagement with Plaintiff concluded by its terms. Despite my efforts to obtain direction from Plaintiff, there has been no response, and it remains unclear whether Plaintiff intends to continue prosecuting this matter.

Given these circumstances, I intend to seek leave of Court to formally withdraw as counsel at the earliest opportunity. I regret not having submitted this letter sooner and apologize to the Court for any inconvenience caused.

Very truly yours,

  
Benjamin R. Zakarin

cc: Msrs. Gordon and Firestone (by email)

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